

7/18/1988

RCRA COMPLIANCE  
REGION 10EPA INSPECTION REPORT SUBMITTAL SLIP

FILE COPY

I. Submitted By: J. PankcaninDate: 7/18/88

☒ Narrative  
☒ Checklist(s)  
☒ Photos  
☒ Attachment(s)  
☐ Comments

## COMPANY NAME

Chem Pro-P91WAD... 2917Insp of. 5/12/88No CMEL Attached submitted this date CP C-2=X MA/LB/OT/FR=0II. Date Reviewed: 7/22/88Reviewed By: RKwTitle: Chief, RLS☒ Accepted ☐ Returned

## III. Comments:

Why no photos?IV. Route To: ① Bill Adams do NOV re: cost estimate - anything else  
② File: RCRA Compliance

USEPA RCRA



3012785

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101



REPLY TO  
ATTN OF: ES-098

JUL 14 1988

RECEIVED  
JUL 18 1988  
WASTE MANAGEMENT BRANCH

MEMORANDUM

SUBJECT: CERCLA Offsite Compliance Inspection at Chemical Processors, Inc. (Pier 91) EPA I.D. No. WAD00812917

FROM: Jim Pankanin, Environmental Engineer  
Engineering and Investigations Section *J. Pankanin*

TO: Chuck Rice, Chief  
RCRA Compliance Section

THRU: Paul A. Boys, Chief  
Engineering and Investigations Section *Paul A. Boys*

FACILITY REVIEW:

On May 12, 1988, I conducted RCRA compliance inspection at Chemical Processors, Inc. Pier 91 facility (Chem Pro). As required by the U.S. EPA CERCLA Offsite Policy, a RCRA-regulated facility must be in compliance with all applicable RCRA regulations before the facility is allowed to handle any CERCLA wastes. It is U.S. EPA policy to inspect such commercial off-site facilities twice a year. Chem-Pro was represented at the inspection by Peter Ressler, compliance manager, Ron Atwood, operations manager, and Nate Mathews, plant manager. The most recent prior U.S. EPA inspection of this facility was conducted on September 28, 1987.

The Chem Pro facility is located on Pier 91, a former U.S. Naval facility located on the northern waterfront of Elliot Bay. The site is owned by the Port of Seattle and has been leased to Chem Pro since approximately 1971. Chem Pro receives and treats large quantities of bilge and ballast waters as well as industrial wastewaters. The main function of this Chem Pro facility is waste oil reclamation, not hazardous waste treatment and storage. The reclaimed waste oil is sold to Pacific Northern Oil to be used as cutting stock in marine fuel oils. About sixty percent (60%) of the Chem Pro Pier 91 site is subleased by Chem Pro to Pacific Northern Oil. Chem Pro notified EPA of its waste oil marketing activities on January 27, 1986 (Attachment 1).



The most recent Part A application for the facility was submitted to the Washington Department of Ecology (Ecology). This Part A was dated February 18, 1986. This Part A lists 22 hazardous waste streams that may be treated and stored in tanks at Chem Pro. All the known tanks at the facility are above ground except the oil-water separator, which is used for treating incoming oily wastewaters. The Part A application reported a tank storage capacity of 9,036,090 gallons, and a tank treatment capacity of 40,000 gallons per day. For a more thorough description of the tank usage and hazardous waste treatment processes, refer to the Ecology compliance inspection report dated June 22, 1987, by Lawrence Ashley. In response to my question, Nate Mathews of Chem Pro stated that about twenty percent (20%) of the materials coming into Chem Pro for treatment are manifested hazardous wastes. He stated that this volume averages 300,000 gallons per month. The rest of the incoming materials are non-hazardous (under RCRA) waste oils and oily wastewater. Nate Mathews also stated that this facility has received no Superfund wastes in the past year. Mr. Mathews also explained that there are currently ten (10) employees at this facility. Operations are two shifts per day.

#### OBSERVATIONS:

We began the site tour at the boiler located in the southern end of the building. Nate Mathews stated that the boiler is operated by Pacific Northern Oil and burns only virgin fuel oil. We proceeded onto the catwalk over the bermed tank farm. All the tanks were covered and the ground within the bermed area was paved with concrete. Nate Mathews stated that the tank level gauges are checked at least twice per operating day. No active leaks or freshly stained areas around the tanks were observed. Chem Pro representatives explained that one of the oily wastewater treatment tanks was overfilled on March 4, 1988. Approximately 119 drums of oily wastewater were recovered from within the bermed area. There was no observed release beyond the bermed area. None of the tanks have high level alarms.

I observed that the sludge decanter/centrifuge unit was not operating. Nate Mathews stated that this unit had not been operational for at least a year, however repairs were almost completed. Waste sludges have been building up in several tanks pending treatment in the decanter/centrifuge unit prior to shipping offsite. I noted that there were no drums of waste stored within or alongside of the tank farm areas. Nate Mathews explained that the drums observed in the large tank area during the September 28, 1987, inspection were shipped to the Chem Pro-Georgetown facility. Inside the warehouse, there were also no longer any drums of waste in storage. There were many drums of oil treatment and wastewater treatment chemicals in the warehouse. The drums were well organized and in good condition. I asked about emergency fire control equipment. Ron Atwood of Chem Pro explained that all extinguishers are checked annually and that there is a foam fire control system throughout the facility.



DOCUMENT REVIEW:

While at Chem Pro, I examined the manifest file, inspection log sheets and personnel training records. The daily inspection form did not include the time of the inspection as required by 40CFR265.15 (d). I mentioned this omission to the Chem Pro representatives who later sent me a revised inspection form with time included (attachment 2). I checked the training records for the three newest employees. No problems with the records or the manifests were noted. I asked about documents concerning financial assurance for closure. I was shown a document dated March, 1988, which verified financial assurance for \$403,000. However, in my subsequent review of the September 18, 1987, closure plan and the 1987 Annual TSD report, it was noted that closure costs were estimated to be \$636,102 (attachment 3).

Copies of the waste analysis plan (dated 2/26/86), closure plan (dated 9/18/87) and contingency plan (dated 10/6/87) were available at the facility during the inspection. A detailed review of these documents was not completed as part of this inspection, since these plans have been referred to the EPA TES contractor for a separate evaluation and report. The same contractor has completed a draft RCRA Facility Assessment (RFA) dated April 28, 1988, which provides a great deal of information regarding this facility. Another recently completed report regarding the Chem Pro Pier 91 facility is the May, 1988, Phase I Hydrogeological Investigation done by Sweet-Edwards/EMCON Inc. This investigation included sampling from eight groundwater monitoring wells. All of these plans and reports will be retained with this report original in the Region 10 RCRA Compliance File.

Attachments

cc: J. Boller w/attachments



# RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

## Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

### I. General Information (Date Revised November 21, 1983)

- A. Date/Time Inspection commenced: May 12, 1988 1:00pm
- B. Facility
- EPA/State ID WAD 00812917
- Name & Addresses Chemical Processors, Inc. Pier 91
1. Mailing: 2203 Airport Way South - Suite 400, Seattle 98134
2. Location: Pier 91, Seattle WA
- Contact: Nate Matthews - plant manager
- Telephone: (206) 223-0500 284-2450

<u>C. Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	( )	( )	( )
40 CFR 270	( )	( )	( )
40 CFR 124	( )	( )	( )
40 CFR 261.5	( )	( )	( )
40 CFR 262	( )	( )	( )
40 CFR 263	( )	( )	( )
40 CFR 264 (Permit)	( )	( )	( )
40 CFR 265	( )	( )	( )

Specific Violations: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### D. Inspector

Name (Print) James F. Panknin Title: Envir. Engineer

Signature \_\_\_\_\_

Organization EPA Region 10, ESD-TSR

Phone 206 - 442-8561



**E. Inspection Participants:**

Name	Title	Phone #
Pete Ressler	Compliance Man.	206-223-0500
Ron Arruad	Operations Man.	
Nate Mathews	Plant Man.	206-289-2450

#### F. Notification/Permit Information

1. Started operation: \_\_\_\_\_ Date: 1971
2. Notification filed: YES NO Date: 8/13/80
3. Part A application filed: YES NO Date: Several times.
4. Part B called/Date Due YES NO Date: Unknown
5. Part B application: YES NO Date: \_\_\_\_\_
6. Changes in Notification or Part A: 2/18/86 Part A for 40,000 - TO1 and 100,000 - TO4 (centrifugation)
7. Facility's classified as: \_\_\_\_\_

- Generator
- Transporter
- Treatment facility
- Storage facility
- Disposal facility
- Small quantity generator
- Recycler
- Less than 90 day storage
- Wastewater treatment unit exemption (WWTU)
- Elementary neutralization unit exemption (ENU)

(4)  
 (-)  
 (4)  
~~(4)~~  
 (-)  
 (-)  
 (-)  
 (-)  
 (-)  
 (-) } Possibly  
 (4) }

8. Does facility have a Part A withdrawal request in ? YES NO

**Status**

Comments: Other Chem Pro subsidiaries do transport from facility.  
Resource Recovery, Inc. Only about 20% of materials that are treated  
at this facility are manifested as haz. was.



G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information *from WDOE Part A (2/18/86)*

a. Characteristic HW (DXXX)?

- (1) Ignitability D001 - mixed oil-water solvents
- (2) Corrosivity D002 - lab pack contaminated solids
- (3) Reactivity No
- (4) EP Toxicity D004 - D011

b. Listed HW?

- (1) HW from non-specific sources (FXXX)

F001, F002, F003, F030

- (2) HW from specific sources (KXXX)

K048, K049, K050, K051, K052

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX

- (2) UXXX

No  
No

d. Has facility petitioned to delist waste?

YES

NO

Date: \_\_\_\_\_

Comments: \_\_\_\_\_

e. Does facility qualify for WWTU or ENU?

YES

NO

Comments: Treated wastewater goes to METRO discharge.

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

- (1) What are the wastes generated?

Mostly D001 per 1987 Annual Report  
*Tank Sludges.*

- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Most incoming wastes are characterized on manifests as WTOP. Facility lab can do flashpoint and total chloride. Based on this analysis, many of the wastes that are generated are characterized as D001.

- (3) Are records available on the determination(s)?

YES

NO

*No EP Tox testing. Same oil and sludges are characterized as state Dangerous wastes based on high total metals content.*



(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain. *All wastes that are present were being treated/stored in tanks.*

2. Specific information  
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

*See Ecology inspection report from 5/6/87 for a thorough description of the haz. was. treatment processes and tank usage.*

*Tank sludges have not been cleaned out for over 1 year, since the decanter/centrifuge unit has been inoperable. Nate Matthews, the plant foreman, said that he hoped to have it running w/in a couple weeks.*



II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date  
Revised November 21, 1983)

N/A

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES NO  
  - a. If yes, generator must comply with the generator regulations (262) and if stored for more than 90 days the applicable TSD regulations. Refer to Generator and/or TSD inspection checklist.

B. Small Quantity Generator (SQG) Regulations

1. A SQG must determine if he generates a hazardous waste (262.11). YES NO
2. Which of the following describes the SQG's treatment and/or disposal of his HW?
  - a. occurs on-site YES NO
  - b. ensure delivery to an off-site facility, either of which is:
    - (1) permitted under Part 270 YES NO
    - (2) in interim status under Part 270 and 265 YES NO
    - (3) authorized to manage HW by an authorized state YES NO
    - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO
    - (5) (a) facility which
      - (a) beneficially uses, re-uses recycles or reclaims his HW YES NO
      - b. treats his waste prior to use, re-use, recycle, or reclamation YES NO
3. Does generator manifest his wastes (not required)? YES NO



III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

- A. Is the facility or does facility claim to be a small quantity generator?

YES ☒ NO

Comments: \_\_\_\_\_

- B. Does generator transport its own waste?

YES ☒ NO

1. If NO, what is contractor's EPA ID, name, address, and phone?

2. If YES, see Transporter Regulations (Section III).

*Resource Recovery Corp.  
United Drain Oil } incoming  
Gasoline Tank Service } wastes.*

- C. Does generator use the manifest system?

☒ YES ☐ NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES ☒ NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

- a. Manifest document number

☒ YES ☐ NO

- b. Generator's name, mailing address, phone number, and EPA ID number

☒ YES ☐ NO

- c. Name and ID number of each transporter

☒ YES ☐ NO

- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any.

☒ YES ☐ NO

- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203.

☒ YES ☐ NO



- Proper shipping name ☒ YES ☐ NO
  - Hazard Class ☒ YES ☐ NO
  - Identification number ☒ YES ☐ NO
- f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. ☒ YES ☐ NO
4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? ☒ YES ☐ NO
5. Does the manifest contain an adequate number of copies to provide one copy for: *Use standardized Chem Pro manifest form.*
- a. Generator's records ☒ YES ☐ NO
  - b. Records of each transporter ☒ YES ☐ NO
  - c. TSD facility owner or operator's records ☒ YES ☐ NO
  - d. Signature by each transporter and return to generator ☒ YES ☐ NO
  - e. Signature by TSD facility and return to generator ☒ YES ☐ NO
6. Does the generator use the manifest properly by:
- a. Signing the certification *Signed by one of several employees* ☒ YES ☐ NO
  - b. Obtaining signature and date of acceptance from initial transporter ☒ YES ☐ NO
  - c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility ☒ YES ☐ NO
  - d. Giving transporter the remaining copies of the manifest *Keep in archive indefinitely* ☒ YES ☐ NO
7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? ☒ YES ☐ NO

8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days?

YES NO *N/A*

9. The Manifest Exception Report must include

a. A legible copy of the manifest and

b. A letter of explanation describing efforts and results of status investigation.

*Has Not Occurred. All wastes currently going to other Chem Pro facilities. Per the 1987 Annual Report, there were two shipments that went to CSSI and Safety-Kleen.*

\*\*\*\*\* TSD FACILITIES SKIP TO MODULE V \*\*\*\*\*

- D. Does generator operate a specific area on-site for container handling or storage?

YES NO

1. Does generator comply with the requirements set forth in governing on-site waste accumulation:

YES NO

a. Labeling and marking

YES NO

b. Dating

YES NO

c. Inspections (weekly for containers)

YES NO

2. Are incompatible wastes segregated?

YES NO

3. What quantities of HW are stored?

4. What is the longest period that it has been stored?

5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.)

YES NO

a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?

YES NO

b. If not properly packaged or in secure tanks, please explain.

YES NO

c. Are containers clearly marked and labeled?

YES NO

d. Do any containers appear to be leaking?

YES NO

e. If yes, approximately how many?



N/A

6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met.

YES NO

a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them?

YES NO

b. Are the containers always closed, except to add or remove waste?

YES NO

c. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)?

YES NO

d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste?

YES NO

e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?

YES NO

f. Is the facility aware of and complying with the following requirements for incompatible wastes:

(1) Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b)

YES NO

(2) HW must not be placed in an unwashed container that previously held an incompatible waste

YES NO

(3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device?

YES NO

Explain?

g. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E?

YES NO

h. Comments:

7. a. Does the generator import or export HW? YES NO
- b. If yes, has notification of this activity been submitted to the EPA Regional Administrator? YES NO
- c. Is a copy of that notification available? (If yes, obtain copy). YES NO
- d. If a copy is not available, or can not be obtained, determine: 1) when the notification was submitted; 2) for what waste type and; 3) for what foreign facility (name and address). YES NO

8. TANKS

Where tanks are used to store hazardous waste, the requirement of 40 CFR Part 265 Subpart J must be complied with (except 265.193), as follows:

- a. Is storage in tanks conducted such that:
- (1) It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO
- (2) It does not produce uncontrolled toxic mists, fumes, dusts, or gases? ( If no, explain) YES NO
- (3) It does not produce uncontrolled flammable fumes or gases? YES NO
- (4) It does not damage the tank? YES NO
- (5) It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments:

- b. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

If no, is secondary containment used? YES NO

(Explain)

- c. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

N/A



d. Are inspections of the following conducted:

- |   |        |
|---|--------|
| (1) Discharge control equipment?<br>How often?  | YES NO |
| (2) Waste feed cut-off systems?<br>How often?   | YES NO |
| (3) Data from tank monitoring equipment?<br>How often?  | YES NO |
| (4) The level of waste in the tank?<br>How often?   | YES NO |
| (5) The structural integrity of tank?<br>How often?<br>How are inspections conducted?<br>What is observed (looked for)? | YES NO |
| (6) The immediate area around the tank<br>for signs of leaks and the integrity<br>of secondary containment (if any)?    | YES NO |

- e. (1) Have any tanks once used for storage of hazardous waste been closed or their function changed? When? N/A
- (2) Were all hazardous wastes and/or residues removed? YES NO
- (3) What was the disposition of the wastes or residues (i.e., where did it go)? YES NO
- (4) When shipped?

- f. Are ignitable or reactive wastes placed in tanks? YES NO
- If yes, what measures are used to prevent ignition or reaction?

- g. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES NO

- h. (1) If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? YES NO
- (2) Are "No Smoking" signs posted? YES NO

(3) Have other measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks?

YES NO

Explain

9. Preparedness and Prevention (265 Subpart C)

- a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment?

YES NO

Explain:

- b. Is internal emergency communication equipment or alarm systems installed?

YES NO

What type?

- c. Is a device (e.g., telephone) immediately available for summoning emergency assistance?

YES NO

- d. Are fire extinguishers or other emergency equipment immediately available on-site?

YES NO

- e. Is emergency communications and response equipment tested?

YES NO

How often?

- f. Is aisle space adequate for emergency response?

YES NO

What is the aisle spacing?

- g. (1) Have any arrangements been made with local emergency response organizations? YES NO

(2) Which organizations?

- (3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?

YES NO

Explain

N/A



## 10. Contingency Plan/Emergency Procedures

- a. Has contingency plan been developed?  
(It may be a modified SPCC plan) YES NO
- b. Have incidents occurred where the plan has been implemented? YES NO
- c. Have incidents occurred where the plan should have been implemented but was not? YES NO
- Explain
- d. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:
- (1) Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? YES NO
- (2) Does the plan describe arrangements made with external emergency response organizations? YES NO
- (3) Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? YES NO
- (a) Is the list current? YES NO
- (4) Is all emergency equipment available at the facility listed in the plan? YES NO
- (a) Is the location and a description of the equipment included? YES NO
- (b) Are capabilities described for each piece or equipment unit? YES NO
- (5) Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? YES NO
- (6) Is a copy of the plan maintained at the active facility (versus main office)? YES NO
- (a) Has a copy been supplied to appropriate off-site emergency response organizations?  
To which? YES NO
- N/A

- (7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO  
How are they available

What are the limits of this person's authority to respond to emergencies?

- (8) Has an emergency occurred? YES NO

Was the plan implemented? YES NO

(Describe the incident)

#### 11. Personnel Training

- a. Has a training program been developed? YES NO

What type? (Classroom? On-the-job Training?)

- b. Does the program include contingency plan and response training? YES NO

- c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including:

- (1) Procedures for using and maintaining equipment? YES NO

- (2) Key parameters for automatic waste feed cut-off? YES NO

- (3) Communications or alarm equipment? YES NO

- (4) Response to fire and explosion? YES NO

- (5) Response to ground water contamination incidents? YES NO

- (6) Facility shut down? YES NO

- d. Are records available at the facility for the following:

- (1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

- (2) Written job description for each job title? YES NO

N/A



(a) Does the job description include the skill, education or qualifications required for the position? YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee? YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

E. Is Generator familiar with Generator Reporting Procedures?

1. Annual Reports YES NO  
2. Exception Reports YES NO  
3. Spills and Discharges into the Environment YES NO  
4. Comments

F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport? YES NO

1. Packaging 40 CFR 173, 178, 179, and with requirements of STATE YES NO  
2. Labeling 49 CFR 172 YES NO  
3. Marking 40 CFR 172 YES NO  
4. Placarding 49 CFR 172 Subpart F YES NO  
5. Containers with of hazardous waste must be marked with the following or essentially equivalent, words and in information, displayed in accordance with 40 CFR 172.304.

HAZARDOUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's Name and Address  
Manifest Document No. \_\_\_\_\_

6. Comments"

G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered? YES NO

1. -If yes, what are they \_\_\_\_\_

- a. Sludge
- b. Characteristic HW
- c. Listed HW
- d. Comments

( )  
( )  
( )

N/A



N/A

IV. Transporter Regulations (40 CFR 263) (Date Revised November 21, 1983)

A. Transporter facility description.

- |                                    |     |    |
|------------------------------------|-----|----|
| 1. Operates as a Transfer Facility | YES | NO |
| 2. Operates as a Storage Facility  | YES | NO |
| 3. Operates as a Generator         | YES | NO |
| 4. Imports Wastes                  | YES | NO |
| 5. Combines Manifested Shipments   | YES | NO |

B. Does transporter have an EPA ID? YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date? YES NO

c. Give remaining copies of the manifest to accepting transporter or designated facility? YES NO

N/A

N/A

4. Does transporter deliver the entire quantity of HM accepted to:
- a. The designated facility listed on the manifest? or YES NO
  - b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO
  - c. The next designated transporter? YES NO
5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO
- F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? YES NO
- 1. Give notice to generator YES NO
  - 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?
  - 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. YES NO
  - 4. Comments YES NO



V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations  
Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity

1. Storage

- a. Containers ( )
- b. Tanks ( )
  - (1) Above ground (✓)
  - (2) Below ground ( )
- c. Surface Impoundments ( )
- d. Waste Piles ( )
- e. Other ( )

2. Treatment

- a. Settling (✓)
  - b. Evaporation ( )
  - c. Filtration ( )
  - d. Energy Recovery ( )
  - e. Incineration ( )
  - f. Thermal Treatment ( )
  - g. Recycling/Recovery (✓)
  - h. Chem/Phys/Biological (✓)
  - i. Other ( )
- Waste oil marketing

3. Disposal

- a. Landfill ( )
- b. Land Treatment ( )
- c. Surface Impoundment ( )
- d. Incineration ( )
- e. Other ( )

4. Comments: Facility had no containers of haz. was. in storage on the day of the inspection.

5. Are hazardous wastes accepted from "outside" (off-site) sources (wastes not generated on site)? YES NO

a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO

b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO

c. How does the facility determine this?

Use a waste profile sheet for each wastestream from each generator. Then do fingerprint analysis.

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? ☒ YES ☐ NO

Describe:

*Do Finger print analysis for Cr<sup>+6</sup>, pH, + phenol (also emulsibility)*

2. Does the facility follow a Written Waste Analysis Plan  
Does the Plan include?

- a. Parameters to be tested? ☒ YES ☐ NO  
b. Methods of analysis? ☒ YES ☐ NO  
c. Methods to get representative samples? ☒ YES ☐ NO  
d. Testing frequency? ☒ YES ☐ NO

Comments: *See 9/26/86 Plan in file.*

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? ☒ YES ☐ NO

*Already had copy.*

4. Security

- a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? ☒ YES ☐ NO

- (1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach? ☒ YES ☐ NO

- (2) Are they legible from a distance of 25 feet or more? ☒ YES ☐ NO

- (3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? ☒ YES ☐ NO

Comments: *Manned entrance 24 hr/day to Pier 91.*

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15)? ☒ YES ☐ NO

- a. Does it include inspecting all:  
Monitoring equipment?  
Safety and emergency equipment?  
Security devices?  
Detecting equipment?

YES NO *N/A*  
☒ YES ☐ NO  
YES NO *N/A*  
YES NO *N/A*



Dangerous waste storage areas?

☒ YES ☐ NO Tank Only -

b. Is this inspection schedule maintained at the facility? ☒ YES ☐ NO

c. Is an inspection log maintained? ☒ YES ☐ NO Daily logs.

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? ☒ YES ☐ NO

Filed by years.

(2) Does the log include:

(a) date <sup>and</sup> time of inspection? ☒ YES ☐ NO

Date Only

(b) inspectors name? ☒ YES ☐ NO

(c) observations? ☒ YES ☐ NO

(d) date and nature of repairs? ☒ YES ☐ NO

Comments: Note: On May 24, 1988, Chem Pro sent EPA a copy of a revised inspection report including the time of inspection.

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? ☒ YES ☐ NO  
What Type? (Classroom/on-the-job)

b. Does the program include contingency plan and response training? ☒ YES ☐ NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: ☒ YES ☐ NO

(1) Procedures for using and maintaining equipment? ☒ YES ☐ NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO N/A

(3) Communications or alarm equipment ☒ YES ☐ NO

(4) Response to fire and explosions ☒ YES ☐ NO

(5) Response to ground water contamination incidents? ☒ YES ☐ NO

Spills and leaks from trucks + tanks.

(6) Facility shut down? YES NO - Not inspected.

d. Are records available at the facility for the following:

- (1) Job title for each position related to hazardous waste management and maintaining equipment? ☒ YES ☐ NO
- (2) Written job description for each job title? ☒ YES ☐ NO
  - (a) Does the job description include the skill, education or qualifications required for the position? ☒ YES ☐ NO
  - (b) The duties assigned to that position? ☒ YES ☐ NO
- (3) A written description of the type and amount of training to be given to those in each job position? ☒ YES ☐ NO
- (4) A record of training completed or experience obtained for each job position by employee ☒ YES ☐ NO
- (5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? ☒ YES ☐ NO

*Checked records of training for 3 new employees.  
No problems noted.  
J. Paulson*



C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment?

☒ YES ☐ NO

Explain: *Have foam system.*

2. Is internal emergency communication equipment or alarm systems installed?

☒ YES ☐ NO

What type? *Telephone Walkie Talkies*

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance?

☒ YES ☐ NO

4. Are fire extinguishers or other emergency equipment immediately available on-site?

☒ YES ☐ NO

5. Is emergency communications and response equipment tested?

☒ YES ☐ NO

How often? *Annually extinguisher testing*

6. Is aisle space adequate for emergency response?

YES NO *N/A*

What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations?

☒ YES ☐ NO

8. Which organizations? *Crowley Envin. under contract for spill response. Fire Dept.*

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?

☒ YES ☐ NO

Explain *Hospitals (Harborview + Ballard) have received copies of contingency plan per Pete Resler.*

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50

1. Has contingency plan been developed?  
(It may be a modified SPCC plan)

☒ YES ☐ NO

2. Have incidents occurred where the plan has been implemented?

☒ YES ☐ NO

3. Have incidents occurred where the plan should have been implemented but was not

☐ YES ☒ NO

Explain

*Tank overfilled w/oily water. Approx 119 barrels were recovered. Occurred 3/4/88.*

4. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

*Already had 7/31/87 and 10/6/87*

*copies of plan,*

*Currently under review by EPA CONTRACTOR.*

- a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment?

☒ YES ☐ NO

- b. Does the plan describe arrangements made with external emergency response organizations?

☒ YES ☐ NO

- c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone?

☒ YES ☐ NO

- (1) Is the list current? *4 CONTRACTS.*

☒ YES ☐ NO

- d. Is all emergency equipment available at the facility listed in the plan?

☒ YES ☐ NO

- (1) Is the location and a description of the equipment included?

☒ YES ☐ NO

- (2) Are capabilities described for each piece or equipment unit?

☒ YES ☐ NO

- e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)?

☒ YES ☐ NO



f. Is a copy of the plan maintained at the active facility (versus main office)?

☒ YES ☐ NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations?

☒ YES ☐ NO

To which? *2 Hospitals + Crowley Environmental.*

5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)?

☒ YES ☐ NO

How are they available *Beepers.*

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred?

☒ YES ☐ NO

b. Was the plan implemented?

☒ YES ☐ NO

c. (Describe the incident)

*3/4/88 Tank overfilled. 119 <sup>Drums I.P.</sup> ~~Tanks~~ of oily wastewater were recovered from bermed area.*

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40  
CFR 265.70

1. **Manifest System**

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? ☒ YES ☐ NO

(2) Note any discrepancies on each copy? ☒ YES ☐ NO

(3) Give delivering transporter one signed and dated copy of the manifest? ☒ YES ☐ NO

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? ☒ YES ☐ NO

(5) Retain a copy of each manifest at the facility for 3 years from delivery? ☒ YES ☐ NO *Retained in archive indefinitely.*

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? ☒ YES ☐ NO

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: ☒ YES ☐ NO

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

*Almost all wastes come in tank trucks. Load is metered as it is pump to tanks or separator.*

d. If significant discrepancies are found, does the TSD facility:

(1) Reconcile discrepancies with generator or transporter within 15 days? or ☒ YES ☐ NO



- (2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved?

*Has not been necessary.*  
YES NO

- e. TSD facilities must keep a written operating record documenting the following details:

- (1) Waste description and quantity received  
(2) Methods and dates of its treatment, storage, and disposal  
(3) The location and quantity of each HW at the facility

*Use daily activities logs for each tank. Record waste volumes and treatment chemicals used.*

## 2. Operating Record

- a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)?

YES NO

- b. Does the record contain the following information.

- (1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility?

YES NO

*Shipments are commingled. Use daily tank logs.*

- (2) The location of each Hazardous Waste within the facility, and its quantity?

YES NO

- (3) A map showing disposal sites?

YES NO

*N/A*

- (4) Summary reports and details of all incidents that require implementing the Contingency Plan?

YES NO

- (5) Records and results of inspections as required (need only be kept three years)?

YES NO

- (6) All closure and post-closure cost estimates required for the facility?

YES NO

*Copy of 9/18/87 closure plan obtained.*

- (7) The results of testing and waste analysis?

YES NO

*Fingerprint Anal. For Each Shipment.*

3. Facility Reporting Procedures

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to ~~EPA~~ by March 1 of each year? *To State.* YES NO

b. Is owner/operator familiar with procedures for emergencies? YES NO

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO

*Has not occurred.*



N/A

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES NO

2. If YES, what is the relevant process unit?

- a. Surface impoundment
- b. Waste pile
- b. Land treatment
- c. Landfills
- d. Other

( )  
( )  
( )  
( )  
( )

Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

4. If NO, has the facility implemented one of the following:

- a. GW Waiver [265.90(c)] ( )
- b. Alternate GW Monitoring System [265.90(d)] ( )
- c. Neutralization Waiver (265.90(e)) ( )
- d. Describe:

5. Does the ground water monitoring program consist of the following:

- a. At least 1 upgradient and 3 downgradient wells? YES NO
- b. GW Sampling and Analysis Plan YES NO
- c. GW sampling quarterly first year YES NO
- d. GW sampling semiannually after that YES NO
- e. Drinking Water Standards parameters YES NO
- f. Sampling frequency \_\_\_\_\_ YES NO
- g. GW Quality parameters YES NO
- h. Sampling frequency \_\_\_\_\_ YES NO
- i. GW Indicator parameters YES NO
- j. Sampling frequency \_\_\_\_\_ YES NO
- h. GW elevation parameters YES NO
- i. Outline GW Quality Assessment Program YES NO
- j. Statistical Analysis of Indicator parameters YES NO

Results:

6. Has the facility implemented GW Quality Assessment program. YES NO
- a. Date: \_\_\_\_\_
- b. Results: \_\_\_\_\_
7. Does the facility maintain the necessary records.
- a. Initial background parameter concentrations YES NO
- b. Subsequent parameters concentrations YES NO
- c. Statistical evaluations YES NO
8. Has the facility reported necessary information
- a. DW Standards for 1st year YES NO
- b. GW Indicator parameters annually YES NO
- c. Statistical evaluation YES NO
9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. - Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)
  - a. Description of how and when the facility will be partially closed (if applicable) and finally closed?  
☒ YES ☐ NO
  - b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?  
☒ YES ☐ NO
  - c. Description of the steps needed to decontaminate the facility equipment during closure? ☒ YES ☐ NO *centrifuge - Does not address ~~centrifuge~~ GP.*
  - d. Comment: *9/18/87 Closure Plan on file. Plan is currently under review by EPA TES contractor.*

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)

*Intend to clean-close.*

*N/A*

- a. Description of how post closure will be carried out for the next 30 years. ☐ ( ) ☐ ( )
- b. Notice to the local land authority within 90 days after closure is completed? ☐ ( ) ☐ ( )
- c. Notice in deed to property? ☐ ( ) ☐ ( )



H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

*Info already in file.*

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million? **YES** NO
- (2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?
- (a) If HW facility liability endorsement(s) ( )
- (b) If HW facility certificate(s) of liability insurance ( )
- (c) financial test ( )
- (d) corporate guarantee ( )
- (e) multiple mechanisms (specify) ( )

2. If a surface impoundment, landfill, or land treatment exist at the facility,

- b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million? YES NO *N/A*
- (2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?
- (a) HW facility liability endorsement(s)' ( )
- (b) HW facility certificate(s) of liability insurance' ( )
- (c) financial test ( )
- (d) corporate guarantee ( )
- (e) multiple mehcanisms (specify) ( )

- c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?
- d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.151?

YES NO

Comment: See copy in inspection file for 9/87 ChemPro - Lucille St. inspection. Language changes made to comply with WAC 173-303-400 and 303-620(10). Use "WDOE" rather than "Department."

2. Assurance

a. Closure

- (1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? YES NO
- (2) Is this cost estimate adjusted annually for inflation? YES NO  
9/18/87 estimate = \$636,102
- (3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)? YES NO

(4) By what method has this been achieved:

- |   |     |
|---|-----|
| (a) Trust fund                            | ( ) |
| (b) Surety bond (with standby trust)      | ( ) |
| (c) Letter of credit (with standby trust) | ( ) |
| (d) Insurance                             | ( ) |
| (e) Financial test                        | ( ) |
| (f) Corporate guarantee                   | ( ) |
| (f) Multiple mechanisms                   | ( ) |

- (5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

- (6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

- (7) Comment: Trust Agreement currently in EPA office awaiting approval by EPA.

b. Post-Closure (Disposal Facilities)

N/A

- (1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO
- (2) Is this cost estimate inflation adjusted annually? YES NO

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

N/A

(4) By what method has this been achieved:

- (a) Trust fund ( )
- (b) Surety bond (with standby trust) ( )
- (c) Letter of credit (with standby trust) ( )
- (d) Insurance ( )
- (e) Financial test ( )
- (f) Corporate guarantee ( )
- (g) Multiple Mechanisms ( )

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

See H.2a.7.



I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES **NO**
2. *Not storing any containers over 90 days.* Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO
3. Are the containers always closed, except to add or remove waste? YES NO
4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO
5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO
6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO
7. Is the facility aware of and complying with the following requirements for incompatible wastes:
- a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO
- b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO
- c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO
- Explain?
8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO
9. Comments:

*No haz. was. container storage.*

J. Subpart J - Tanks (40 CFR 265.190)

1. Does this section apply to this facility? YES NO

2. - Do tanks on the facility hold hazardous waste? YES NO

If so, what are their contents?

Treatment sludges (metal hydroxides and other materials)

3. Is storage in tanks conducted such that:

a. It does not generated heat, pressure, fire, explosion or violent reaction?  
(If no, explain) YES NO

b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases?  
( If no, explain) YES NO

c. It does not produce uncontrolled flammable fumes or gases? YES NO

d. It does not damage the tank? YES NO

e. It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments: Bermed. No spills, observed.

Concrete floor within bermed area.

4. Is 2 feet of freeboard maintained in uncovered tanks? YES NO N/A

Tanks are covered except for vents.  
If no, is secondary containment used? YES NO

(Explain) All tanks are bermed.

5. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO N/A

Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? YES NO

How:

Waste feed cut-off ( )  
Bypass system to another tank ( )  
High level alarm ( )  
Other Gauges checked at least 2X per day.

7. Are inspections of the following conducted:

- a. Discharge control equipment? ☒ YES ☐ NO  
How often? *Valves checked daily for leaks*
- b. Waste feed cut-off systems? YES ☐ NO *N/A*  
How often?
- c. Data from tank monitoring equipment? YES ☐ NO *N/A*  
How often?
- d. The level of waste in the tank? ☒ YES ☐ NO  
How often? *2 X/day*
- e. The structural integrity of tank? ☒ YES ☐ NO  
How often?  
How are inspections conducted? *Visual, Daily, Spills*  
What is observed (looked for)?
- f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? ☒ YES ☐ NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When?

- a. Were all hazardous wastes and/or residues removed? ☒ YES ☐ NO
- b. What was the disposition of the wastes or residues (i.e., where did it go)? ☒ YES ☐ NO
- c. When shipped? *Other Chem Pro facilities*  
*Not Determined*

9. Are ignitable or reactive wastes placed in tanks?

YES ☒ NO

10. If yes, what measures are used to prevent ignition or reaction?

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue?

YES ☒ NO

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements?

YES ☐ NO *N/A*

13. Are "No Smoking" signs posted?

☒ YES ☐ NO



14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks?

☒ YES ☐ NO

- Explain *Foam System for fire control.*

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained?

☒ YES ☐ NO

16. Does the company have and follow a written waste analysis plan?

☒ YES ☐ NO

- a. Does the plan identify parameters used?

☒ YES ☐ NO

Explain *Plan currently under review by EPA contractor,*

- b. Sampling Method?

☒ YES ☐ NO

Explain

- c. How frequent is analysis repeated? *Every tank load*

☒ YES ☐ NO

- d. Are results of waste analysis and trial tests placed in the facility's operating record.

*yes. JP*

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank?

☒ YES ☐ NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. Does this section apply to this facility? YES NO
2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO
3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO
4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO
5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO
6. Are results of waste analyses documented in the facility's operating record? YES NO
7. Are the surface impoundments inspected on a routine basis? How often? YES NO
8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO
9. Comments:

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

- L. Subpart L - Waste Piles (40 CFR 265.250)
- M. Subpart M - Land Treatment (40 CFR 265.270)
- N. Subpart N - Landfills (40 CFR 265.300)
- O. Subpart O - Incinerators (40 CFR 265.340)
- P. Subpart P - Thermal Treatment (40 CFR 265.370)
- Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
- R. Subpart R - Underground Injection (40 CFR 265.430)



**VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)**

**This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.**

Facility Name: Chem Pro Pier 91  
ID Number: WAD 00812917  
Inspector: James Panikaris  
Date: 6/28/88

DRAFT  
RCRA F-SOLVENT LAND RESTRICTION  
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

See Attached 7/12/88 letter  
from Chem Pro

I. FACILITY IDENTIFICATION

A. Facility Name Chemical Processors Inc. - Pier 91 B. Street (or other identifier) Pier 91  
C. City Seattle D. State WA E. Zip Code 98107 F. County Name KING  
G. Nature of business; identification of operations Waste Oil and Wastewater TREATMENT  
H. EPA ID # WAD 00812917

I. Facility Contact (Name and Phone Number) NATE MATHEWS (206) 223-0500

II.A. For onsite facilities, complete the generator checklist

Comments

B. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements [264.13 or 265.13]?  
☐ Yes ☐ No *Not Determined. Chem-Pro representatives said all plans were being updated.*
2. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a)/265.13(a)]?  
☒ Yes ☐ No *Required on waste profile sheet.*
  - a. Did testing include analyses for all F001-F005 constituents?  
☐ Yes ☐ No *Not determined.*
  - b. Were analyses performed using TCLP? ☐ Yes ☒ No
  - c. Were analyses conducted onsite or offsite (identify offsite lab)?  
☐ On ☒ Off: Require waste profile sheet on each customer wastestream.
  - d. Describe frequency of sampling Each incoming shipment of haz. wds. gets fingerprint analysis.
  - e. Describe procedures used to identify manifest discrepancies Tank trucks are gauged during pumpout. All samples tested for flashpoint and total chlorides.
3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? ☒ Yes ☐ No

Facility Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

C. Storage [268.50]

Comments

1. a. Were restricted wastes exceeding treatment standards stored? ☐ Yes ☐ No  
If no, go to "D."
- b. Are all containers clearly marked to identify content and date(s) entering storage? ☐ Yes ☐ No
- c. Do operating records track the location, quantity and dates that waste exceeding treatment standards entered and were removed from storage? ☐ Yes ☐ No
- d. Do operating records agree with container labeling? ☐ Yes ☐ No
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☐ No  
If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No  
If yes, state how: \_\_\_\_\_
- f. Were tanks emptied at least once per year, and do operating records show that volume of waste removed from tanks annually at least equals tank volume? ☒ Yes ☐ No
- g. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☒ No  
If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: \_\_\_\_\_
- h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? ☐ Yes ☒ No

Not determined. None were being stored during inspection.

N/A No container storage.

N/A



D. Treatment in Surface Impoundments [268.4]

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? ☐ Yes ☒ No  
If no, go to E.



Facility Name: \_\_\_\_\_  
 ID Number: \_\_\_\_\_  
 Inspector: \_\_\_\_\_  
 Date: \_\_\_\_\_

2. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency? ☐ Yes ☐ No
3. Have the minimum technology requirements been met? ☐ Yes ☐ No
  - a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s)? ☐ Yes ☐ No
4. Have the Subpart F ground-water monitoring requirements been met? ☐ Yes ☐ No
5. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record [264.13/265.13] and [264.73/265.73]? ☐ Yes ☐ No
6. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in [268.41]? ☐ Yes ☐ No
7. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_
8. Does the operating record adequately document the results of waste analyses performed in accordance with [268.41] and [264.73/265.73]? ☐ Yes ☐ No
9. Have the hazardous waste residues that exceed the treatment standards [268.41] been removed adequately and on an annual basis? ☐ Yes ☐ No
  - a. If answer is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? ☐ Yes ☐ No
10. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
11. When removed, were solvent wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No

Comments

N/A



Facility Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

12. When removed, were wastes treated prior to disposal?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

a. If yes, are waste residues treated on or offsite?  
\_\_\_\_\_ Onsite \_\_\_\_\_ Offsite

b. Identify management method \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Comments

N/A



E. Treatment

1. Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)?  
\_\_\_\_\_ Yes ☒ No

If no, go to "F."

2. Describe the treatment processes for F-solvent wastes.

Storage in tank. Mixed with other contaminated waste oils. See letter from Chem Pro dated 7/12/88 (Attached)

3. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [268.7(b)(2)]?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

N/A

4. Describe frequency of testing of treatment residuals.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



5. Was dilution used as a substitute for treatment [268.3]?  
\_\_\_\_\_ Yes ☒ No

6. Are certifications and results of waste analyses kept in the operating record [264.73(b)(3)/265.73(b)(3)] and [268.7(c)]?  
☒ Yes ☒ No

No certifications observed.  
No treatment to attain standards.

7. Are notice with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [268.7(b)]?  
\_\_\_\_\_ Yes ☒ No

~~WTP~~ JP

Shipments of waste oil contaminated w/ F Solvents was shipped offsite as WTO2 on 4/30/87. See attached letter and manifests.

8. Are certifications submitted for each shipment [268.7(b)(2)(i)]?  
\_\_\_\_\_ Yes ☒ No



Facility Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

F. Land Disposal

Comments

N/A

1. Were F-solvent wastes placed in land disposal units (landfills, surface impoundments [for this question, do not include if in "D"] waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker? Yes ☐ No ☐
2. Did facility have the notice and certification from generators/treaters in its operating record [268.7(c); 268.7(a),(b)]? Yes ☐ No ☐
3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [268.7(c)]? Yes ☐ No ☐  
If yes, at what frequency? \_\_\_\_\_
4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units excluding national capacity variances [268.30(a)]? Yes ☐ No ☐  
If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or treatment standard variance [268.44]? Yes ☐ No ☐
5. Were F-solvent wastes subject to a national or case-by-case capacity variance/extension disposed? Yes ☐ No ☐
  - a. If yes, were these wastes disposed of in a facility that has a new, replacement, or laterally expanded landfill or impoundment? Yes ☐ No ☐  
If (a) is yes, have the minimum technology requirements been met for all such units at the facility [268.5(h)(2)] and [268.30(b)]? Yes ☐ No ☐
6. Were adequate records of disposal maintained? Yes ☐ No ☐
7. If wastes subject to a nationwide variance [268.30], case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal? Yes ☐ No ☐
8. What is the volume of F-solvent waste disposed to date by waste? \_\_\_\_\_



Facility Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports [268.5]? ☐ Yes ☐ No

Comments

N/A

APPENDIX B  
TREATMENT STANDARDS FOR F-SOLVENTS

FO01-FO05 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloro 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15



**CHEMICAL PROCESSORS, INC.**

2203 AIRPORT WAY SO., SUITE 400  
SEATTLE, WASHINGTON 98134

PHONE: (206) 223-0500  
FAX: (206) 223-7791

July 12, 1988

James Pankanin  
U.S. EPA Region X  
1200 Sixth Avenue  
M/S 329  
Seattle, WA 98101

Dear Mr. Pankanin:

Upon your review of the 1987 Annual TSD Hazardous Waste Report for the Chemical Processors, Inc. (Pier 91) facility (WAD000812917) at 2001 W. Garfield Street, Seattle, you requested information on a manifested waste received on March 25, 1987 from the Boeing Company.

On March 25, 1987 the Boeing Company Plant #2 sent, via Resource Recovery Corporation, 1,000 gallons of Waste Combustible Liquid, N.O.S. (D001), waste oil, under manifest No. 70664 to Chempro's Pier 91 facility. Before unloading, Chempro facility personnel sampled the load and analyzed it using the facility's Dohrman analyzer. The analysis revealed 3418 ppm total chlorinated. The Chempro plant manager notified Boeing of the discrepancy and received their authorization to correct the waste description and the waste codes on the manifest (enclosed). The contaminated waste oil was then off-loaded and pumped into Tank #110. The waste was stored in Tank #110 with other contaminated waste oils until April 29, 1987 when the tank contents were shipped to the Chemical Processors, Inc. Tacoma, Washington facility (WAD020257945). The manifests for these five shipments are enclosed.

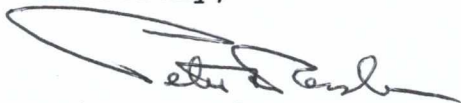
At the Tacoma facility the contaminated oil was blended into bulk storage tanks. The contents were then manifested to the Chemical Processors, Inc. Lucile Street, Seattle



facility (WAD000812909) for bulk rail shipment to Systech Corporation in Fredonia, Kansas (KSD980633259) for alternative fuel usage in their lime kiln.

If you need any additional information, please contact me at 223-0500.

Sincerely,



Peter Ressler  
Compliance Manager

PKR:tk

cc: Paul Johanson, The Boeing Company  
N. E. Mathews  
K. D. Price  
D. L. Aubry  
K. A. Lund  
R. L. Atwood  
M. P. Keller  
D. F. Stefani

**CHEMICAL PROCESSORS, INC.**

2203 AIRPORT WAY SOUTH, SUITE 400  
SEATTLE, WASHINGTON 98134

PC-264

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>WAD 009 256 819</b>	Manifest Document No. <b>70664</b>	2. Page of <b>1 OF</b>	Information in the shaded areas is not required by federal law.	
3. Generator's Name and Mailing Address <b>THE BOEING COMPANY— PLANT 2 P.O. BOX 3707, M/S IE-71, SEATTLE, WA 98124-2207</b>				A. State Manifest Document Number		
4. Generator's Phone (206) 241-3535				B. State Generator's ID		
5. Transporter 1 Company Name <b>RESOURCE RECOVERY</b>		6. US EPA ID Number <b>WAD 061 672 812</b>		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone <b>(206) 767-0350</b>		
9. Designated Facility Name and Site Address <b>CHEM-PRO PIER 91 PIER 91 BLDG. 19 SEATTLE, WA 98119</b>		10. US EPA ID Number <b>WAD 000 812 917</b>		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone <b>(206) 284-2450</b>		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) HM (✓) <b>X WASTE COMBUSTIBLE LIQUID, N.O.S. COMBUSTIBLE LIQUID (OIL) CONTAINING 111 TRI</b>			12. Containers No. <b>1</b> Type <b>TT</b>	13. Total Quantity <b>1,000</b>	14. Unit <b>G</b>	I. Waste No. <b>70664-0001 F001 F002</b>
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above			
15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION PICKUP DATE/TIME: SCHEDULED DATE <b>03/25/87</b> TIME <b>1030</b> AM/PM ESTIMATED QUANTITY <b>1000</b> WASTE LOCATION: PLANT <b>PL2</b> BLDG. <b>2-91</b> DOOR COL TANK SCHEDULED TRUCK NUMBER <b>40VT6005</b> ACTUAL TRUCK NUMBER PLACARD TRUCK: <input checked="" type="checkbox"/> COMBUSTIBLE, <input type="checkbox"/> FLAMMABLE, <input type="checkbox"/> CORROSIVE <input type="checkbox"/> DRIVE SAFELY, <input type="checkbox"/> OTHER 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable, and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name <b>CAL PATTERSON</b>			Signature <i>[Signature]</i>		On Behalf of THE BOEING CO. Month Day Year <b>3-25-87</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>David Gammot</b>			Signature <i>[Signature]</i>		Month Day Year <b>3-25-87</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space <b>SPOKE WITH LEE @ BOEINGS - CHANGED DOT DESCRIPTION &amp; WASTE NO. Bob Mooney 3-25-87</b>						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Hector Gamboa</b>			Signature <i>[Signature]</i>		Month Day Year <b>03-25-87</b>	

GENERATOR  
TRANSPORTER  
FACILITY



# CHEMICAL PROCESSORS, INC./RESOURCE RECOVERY CORP. 09353

5501 Airport Way So. • Seattle, WA 98108  
Chempro 767-0350 • Resource Recovery 767-0355

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(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>WAD000812917</b>		Manifest Document No. <b>07353</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address <b>CHEMICAL PROCESSORS, INC. PIER 91, 200 W. GARFIELD ST SEATTLE, WA 98119</b>						A. State Manifest Document Number											
4. Generator's Phone (206) 284-2450						B. State-Generator's ID											
5. Transporter 1 Company Name <b>RESOURCE RECOVERY</b>			6. US EPA ID Number <b>WAD000812917</b>			C. State Transporter's ID											
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone											
9. Designated Facility Name and Site Address <input type="checkbox"/> Chempro 734 So. Lucile St. Seattle, WA (206) 767-0350 <input type="checkbox"/> Chempro Pier 91 Seattle, WA (206) 284-2450 <input checked="" type="checkbox"/> Chempro 1701 Alexander Tacoma, WA (206) 627-7568 <input type="checkbox"/> Other:			10. US EPA ID Number <b>WAD 000812909</b> <b>WAD 000812917</b> <b>WAD 020257945</b>			E. State Transporter's ID											
						F. Transporter's Phone											
						G. State Facility's ID											
						H. Facility's Phone											
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.					
						No.		Type									
						a. <input checked="" type="checkbox"/> HM		1		TT		5550		G		WTO2	
						b.											
						c.											
J. Additional Descriptions for Materials Listed Above <b>WASTE OIL CONTAMINATED WITH CHLORINATED SOLVENTS</b>						K. Handling Codes for Wastes Listed Above											
15. Special Handling Instructions and Additional Information																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																	
Printed/Typed Name <b>Bob Moody</b>						Signature <i>Bob Moody</i>						Month Day Year <b>4 30 87</b>					
17. Transporter 1 Acknowledgement of Receipt of Materials																	
Printed/Typed Name <b>Charles D. Jensen</b>						Signature <i>Charles D. Jensen</i>						Month Day Year <b>4 30 87</b>					
18. Transporter 2 Acknowledgement of Receipt of Materials																	
Printed/Typed Name						Signature						Month Day Year					
19. Discrepancy Indication Space																	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																	
Printed/Typed Name <b>Chris Basil</b>						Signature <i>Chris Basil</i>						Month Day Year <b>4 30 87</b>					



## CHEMICAL PROCESSORS, INC. / RESOURCE RECOVERY CORP.

05554

5501 Airport Way So. • Seattle, WA 98108  
Chempro 767-0350 • Resource Recovery 767-0355Please print or type  
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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WAD 000812 917	Manifest Document No. 109354	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address CHEMICAL PROCESSORS, INC. PIER 91, 2001 W. GARFIELD ST 5501 AIRPORT WAY SO. SEATTLE, WA. 98119				A. State Manifest Document Number		
4. Generator's Phone 206 284-2450				B. State Generator's ID		
5. Transporter 1 Company Name RESOURCE RECOVERY		6. US EPA ID Number WAD 061672 812		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address <input type="checkbox"/> Chempro 734 So. Lucile St. Seattle, WA (206) 767-0350 <input type="checkbox"/> Chempro Pier 91 Seattle, WA (206) 284-2450 <input checked="" type="checkbox"/> Chempro 1701 Alexander Tacoma, WA (206) 627-7568 <input type="checkbox"/> Other:		10. US EPA ID Number WAD 000812909 WAD 000812917 WAD 020257945		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> WASTE COMBUSTIBLE LIQUID N.O.S. COMBUSTIBLE LIQUID NA 1993 (AQ 1000)			No. Type			
b.			1 TT	7,500	G	WT02
c.						
d.						
J. Additional Descriptions for Materials Listed Above WASTE OIL CONTAMINATED WITH CHLORINATED SOLVENTS				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Bob Moody			Signature Bob Moody		Month Day Year 4/30/87	
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name David L. Gammell			Signature David L. Gammell		Month Day Year 4/30/87	
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name Chris Basil			Signature Chris Basil		Month Day Year 4/30/87	

ORIGINAL-RETURN TO GENERATOR



# CHEMICAL PROCESSORS, INC./RESOURCE RECOVERY CORP. 09355

5501 Airport Way So. • Seattle, WA 98108  
Chempro 767-0350 • Resource Recovery 767-0355

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>WAD 000812917</b>		Manifest Document No. <b>09355</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>CHEMICAL PROCESSORS, INC. PIER 91, 2001 W. CARFIELD ST., SEATTLE, WA 98119</b>						A. State Manifest Document Number							
4. Generator's Phone <b>(206) 284-2450</b>						B. State Generator's ID							
5. Transporter 1 Company Name <b>RESOURCE RECOVERY</b>			6. US EPA ID Number <b>WAD 061672812</b>			C. State Transporter's ID							
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone							
9. Designated Facility Name and Site Address <input type="checkbox"/> Chempro 734 So. Lucile St. Seattle, WA (206) 767-0350 <input type="checkbox"/> Chempro Pier 91 Seattle, WA (206) 284-2450 <input checked="" type="checkbox"/> Chempro 1701 Alexander Tacoma, WA (206) 627-7568 <input type="checkbox"/> Other:			10. US EPA ID Number <b>WAD 000812909</b> <b>WAD 000812917</b> <b>WAD 020257945</b>			E. State Transporter's ID							
						F. Transporter's Phone <b>767-0350</b>							
						G. State Facility's ID							
						H. Facility's Phone <b>627-7568</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>WASTE COMBUSTIBLE LIQUID N.O.S., COMBUSTIBLE LIQUID NA 1993 (RQ 1000)</b>						No. <b>1</b>		Type <b>TT</b>		<b>6000</b>		<b>G WTCZ</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above <b>WASTE OIL CONTAMINATED WITH CHLORINATED SOLVENTS</b>						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>TOM STEINHAUER</b>						Signature <i>Tom Steinhauer</i>						Month Day Year <b>4 30 87</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <i>Charles D. Jensen</i>						Signature <i>Charles D. Jensen</i>						Month Day Year <b>4 30 87</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
Printed/Typed Name <i>Tom Tainer</i>						Signature <i>Tom Tainer</i>						Month Day Year <b>4 30 87</b>	



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Form Approved. OMB No. 2050-0039. Expires 9-30-88

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>WAD 000 812 917</b>		Manifest Document No. <b>109356</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address <b>Chemical Processors, Inc. 5501 Airport Way Ste. Seattle, Wa 98108</b>						A. State Manifest Document Number				
4. Generator's Phone <b>(206) 284-2450</b>						B. State Generator's ID				
5. Transporter 1 Company Name <b>Resource Recovery</b>						C. State Transporter's ID				
7. Transporter 2 Company Name						D. Transporter's Phone				
6. US EPA ID Number <b>WAD 061672812</b>						E. State Transporter's ID				
8. US EPA ID Number						F. Transporter's Phone <b>767-0350</b>				
9. Designated Facility Name and Site Address <input type="checkbox"/> Chempro 734 So. Lucile St. Seattle, WA (206) 767-0350 <input type="checkbox"/> Chempro Pier 91 Seattle, WA (206) 284-2450 <input checked="" type="checkbox"/> Chempro 1701 Alexander Tacoma, WA (206) 627-7568 <input type="checkbox"/> Other:						10. US EPA ID Number <b>WAD 000812909</b> <b>WAD 000812917</b> <b>WAD 020257945</b>				
						G. State Facility's ID				
						H. Facility's Phone <b>627-7568</b>				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
						No.	Type			
a. <b>WASTE COMBUSTIBLE LIQUID N.O.S.</b>						1	TT	7500	G	WT02
b. <b>COMBUSTIBLE LIQUID N.A. 1993 (RQ1000)</b>										
c.										
d.										
J. Additional Descriptions for Materials Listed Above <b>WASTE OIL CONTAMINATED WITH Chlorinated SOLVENTS.</b>						K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name <b>Hector Gamboa</b>						Signature <i>Hector Gamboa</i>		Month Day Year <b>04 30 87</b>		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name <b>David Caswell</b>						Signature <i>David Caswell</i>		Month Day Year <b>4 30 87</b>		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name						Signature		Month Day Year		
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.										
Printed/Typed Name <b>Tom Tainer</b>						Signature <i>Tom Tainer</i>		Month Day Year <b>14 30 87</b>		



Please print or type  
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>WAD000B12917</b>		Manifest Document No. <b>09351</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address <b>CHEMICAL PROCESSORS, INC PIER 91 FACILITY 5501 AIRPORT WAY SO. SEATTLE, WA 98108</b>						A. State Manifest Document Number				
4. Generator's Phone <b>(206) 284-2450</b>						B. State Generator's ID				
5. Transporter 1 Company Name <b>RESOURCE RECOVERY</b>						C. State Transporter's ID				
6. US EPA ID Number <b>WAD0061672812</b>						D. Transporter's Phone				
7. Transporter 2 Company Name						E. State Transporter's ID				
8. US EPA ID Number						F. Transporter's Phone <b>767-0350</b>				
9. Designated Facility Name and Site Address <input type="checkbox"/> Chempro 734 So. Lucile St. Seattle, WA (206) 767-0350 <input type="checkbox"/> Chempro Pier 91 Seattle, WA (206) 284-2450 <input checked="" type="checkbox"/> Chempro 1701 Alexander Tacoma, WA (206) 627-7568 <input type="checkbox"/> Other:						10. US EPA ID Number WAD 000812909 WAD 000812917 WAD 020257945				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <b>WASTE COMBUSTIBLE LIQUID N.O.S. COMBUSTIBLE LIQUID NA 1993 (RQ 1000)</b>						No.	Type			
						1	TT	5000	G	WTO2
b.										
c.										
d.										
J. Additional Descriptions for Materials Listed Above <b>WASTE OIL <del>CHLORINATED</del> CONTAMINATED WITH CHLORINATED SOLVENTS</b>						K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name <b>JOHN RAMSAY</b>						Signature <i>John Ramsay</i>		Month Day Year <b>04 30 87</b>		
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Jim A. Rouse</i>		Month Day Year <b>4 30 87</b>		
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Month Day Year		
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.										
Printed/Typed Name <b>Tom Tainer</b>						Signature <i>Tom Tainer</i>		Month Day Year <b>4 30 87</b>		





Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

## Comments

**I. Name of Installation**

C H E M I C A L P R O C E S S O R S U N C

## Street or P.O. Box

### III. Location of Installation

Street or Route Number

#### IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

## V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

### A. Hazardous Waste Activity

### B. Used Oil Fuel Activities

**VII. Waste Fuel Burning: Type of Combustion Device** (enter "X" in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

### A Utility Boiler

☐ B. Industrial Boiler☐ C. Industrial Furnace

**VIII. Mode of Transportation** *(transporters only — enter 'X' in the appropriate box(es))*

## IX. First or Subsequent Notification

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

C. Installation's EPA ID Number

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

Continue on reverse

Attachment #1



**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

8. **Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 4. Toxic  
(D000)

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

Date Signed \_\_\_\_\_

1-27-86